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Commissioner

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR QUALITY

**ADM Alliance Nutrition, Inc.
4359 State Road 1 North
Hagerstown, Indiana 47346**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F177-15941-00067	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 11, 2002 Expiration Date: October 11, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary animal feed processing operation.

Authorized individual:	Director of Safety, Health, and Environmental Compliance
Source Address:	4359 State Road 1 North, Hagerstown, Indiana 47346
Mailing Address:	4359 State Road 1 North, Hagerstown, Indiana 47346
SIC Code:	2048
Source Location Status:	Wayne
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD Rules
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) animal feed processing operation, constructed in 1996, with a maximum feed throughput of thirty (30) tons per hour, consisting of the following operations:
 - (1) Storage facilities venting internally, consisting of forty-two (42) grain storage bins with a combined total storage capacity of 1,761 tons, six (6) pellet supply storage bins with a combined total storage capacity of 120 tons, six (6) product bagging storage bins with a combined total storage capacity of 120 tons, and twenty-eight (28) product bulk storage bins with a combined storage capacity of 585 tons;
 - (2) Enclosed shipping and receiving operations under negative pressure;
 - (3) Enclosed handling and mixing operations;
 - (4) Hammermill grinding operations, with a maximum capacity of twenty-eight (28) tons per hour of feed, using one (1) baghouse for control, and exhausting to stack S-2;
 - (5) Two (2) pelletizing/pellet cooling operations, each with a maximum capacity of ten (10) tons per hour, using two (2) cyclones for control, and exhausting to stacks S-3 and S-4; and
 - (6) Totally enclosed product bagging and loadout operations.
- (b) One (1) natural gas-fired boiler, with No. 2 fuel oil backup, constructed in 1997, with a maximum capacity of 10.4 million British thermal units per hour, and exhausting to stack S-1.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 10 tons per year SO₂, NO_x, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:

- (a) One (1) No. 2 fuel oil storage tank with a maximum capacity of 2,000 gallons;
- (b) One (1) molasses storage tank with a maximum storage capacity of 50 tons; and
- (c) One (1) animal fat storage tank with a maximum capacity of 50 tons.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized

individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ,. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-

15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

-
- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial thirty (30) days compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) animal feed processing operation, constructed in 1996, with a maximum feed throughput of thirty (30) tons per hour, consisting of the following operations:
- (1) Storage facilities venting internally, consisting of forty-two (42) grain storage bins with a combined total storage capacity of 1,761 tons, six (6) pellet supply storage bins with a combined total storage capacity of 120 tons, six (6) product bagging storage bins with a combined total storage capacity of 120 tons, and twenty-eight (28) product bulk storage bins with a combined storage capacity of 585 tons;
 - (2) Enclosed shipping and receiving operations;
 - (3) Enclosed handling and mixing operations;
 - (4) Hammermill grinding operations, with a maximum capacity of twenty-eight (28) tons per hour of feed, using one (1) baghouse for control, and exhausting to stack S-2;
 - (5) Two (2) pelletizing/pellet cooling operations, each with a maximum capacity of ten (10) tons per hour, using two (2) cyclones for control, and exhausting to stacks S-3 and S-4; and
 - (6) Totally enclosed product bagging and loadout operations.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 PM10 Emission Limitation [326 IAC 2-8][326 IAC 2-2][40 CFR 52.21]

The source shall be subject to the following emission limitations:

Operation	PM10 Emission Limit (lb/hr)	PM10 Emission Limit (ton/yr)
Receiving	3.65	16.0
Shipping	3.65	16.0
Handling	8.68	38.0
Grinding/Hammermilling	2.05	9.0
Pellet Cooling Operations	4.34	19.0

These limits are structured such that when including emissions from the boiler, the source total PM10 emissions remain less than one hundred (100) tons per year. This renders the requirements of 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 not applicable.

D.1.2 PSD Minor Limitation [326 IAC 2-2][40 CFR 52.21]

Pursuant to CP177-5092-00067, issued May 29, 1996, the Permittee shall be subject to the following emission limitations:

Operation	PM Emission Limit (lb/hr)	PM Emission Limit (ton/yr)
Receiving/Shipping/Handling	11.2	49.0
Grinding/Hammermilling	25.4	111.1
Pellet Cooling Operations	20.3	88.7

These limits are structured such that, when including emissions from the boiler, the source total PM emissions remain below two hundred fifty (250) tons per year. This renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Areas), particulate matter emissions from units described in this section shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Particulate Matter (PM)

In order to comply with Conditions D.1.1, D.1.2 and D.1.3, the baghouse and cyclones for PM and PM10 control shall be in operation and control emissions from the grinding/hammermilling and pellet cooling processes at all times that the processes are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

- (a) Once per shift visible emission notations of the S-2, S-3, and S-4 exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the grinding/hammermilling process, at least once per shift when the grinding/hammermilling process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the grinding/hammermilling process when venting to the atmosphere. All defective bags shall be replaced.

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.10 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the grinding/hammermilling process when.

D.1.11 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C -

Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.12 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of once per shift visible emission notations of S-2, S-3, and S-4 exhaust.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain once per shift records of the pressure drop across the baghouse controlling the grinding/hammermilling operation.
- (c) To document compliance with Conditions D.1.8 and D.1.10, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.8 and D.1.10 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) natural gas-fired boiler, with No. 2 fuel oil backup, constructed in 1997, with a maximum capacity of 10.4 million British thermal units per hour, and exhausting to stack S-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Areas), particulate matter emissions from the boiler shall not exceed 0.6 pounds per million British thermal units heat input.

D.2.2 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the boiler listed in this section except when otherwise specified in 40 CFR 60, Subpart Dc.

D.2.3 Sulfur Dioxide (SO₂) [326 IAC 12-1][40 CFR 60, Subpart Dc]

Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from the boiler shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.5 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
- (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

- (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.6 Visible Emissions Notations

- (a) Visible emission notations of the boiler stack exhaust shall be performed once per shift during normal daylight operations when combusting No. 2 fuel oil and when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust once per shift when combusting No. 2 fuel oil.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.8 Reporting Requirements

- (a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period. The natural gas-fired boiler certification does require the certification by the responsible official as defined by 326 IAC 2-7-1(34);
- (b) The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported.
- (c) A quarterly summary of the information to document compliance with 40 CFR 60, Subpart Dc and Condition D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3

FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 10 tons per year SO₂, NO_x, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:

- (a) One (1) No. 2 fuel oil storage tank with a maximum capacity of 2,000 gallons;
- (b) One (1) molasses storage tank with a maximum storage capacity of 50 tons; and
- (c) One (1) animal fat storage tank with a maximum capacity of 50 tons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

There are no specific regulations applicable to these units.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: ADM Alliance Nutrition, Inc.
Source Address: 4359 State Road 1 North, Hagerstown, Indiana 47346
Mailing Address: 4359 State Road 1 North, Hagerstown, Indiana 47346
FESOP No.: F177-15941-00067

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: ADM Alliance Nutrition, Inc.
Source Address: 4359 State Road 1 North, Hagerstown, Indiana 47346
Mailing Address: 4359 State Road 1 North, Hagerstown, Indiana 47346
FESOP No.: F177-15941-00067

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: ADM Alliance Nutrition, Inc.
Source Address: 4359 State Road 1 North, Hagerstown, Indiana 47346
Mailing Address: 4359 State Road 1 North, Hagerstown, Indiana 47346
FESOP No.: F177-15941-00067

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel
From To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: ADM Alliance Nutrition, Inc.
Source Address: 4359 State Road 1 North, Hagerstown, Indiana 47346
Mailing Address: 4359 State Road 1 North, Hagerstown, Indiana 47346
FESOP No.: F177-15941-00067

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

October 11, 2002

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP)**

Source Background and Description

Source Name:	ADM Alliance Nutrition, Inc.
Source Location:	4359 State Road 1 North, Hagerstown, Indiana 47346
County:	Wayne
SIC Code:	2048
Operation Permit No.:	F177-15941-00067
Permit Reviewer:	ERG/KC

The Office of Air Quality (OAQ) has reviewed a FESOP application from ADM Alliance Nutrition, Inc. relating to the operation of an animal feed processing facility.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) animal feed processing operation, constructed in 1996, with a maximum feed throughput of thirty (30) tons per hour, consisting of the following operations:
 - (1) Storage facilities venting internally, consisting of forty-two (42) grain storage bins with a combined total storage capacity of 1,761 tons, six (6) pellet supply storage bins with a combined total storage capacity of 120 tons, six (6) product bagging storage bins with a combined total storage capacity of 120 tons, and twenty-eight (28) product bulk storage bins with a combined storage capacity of 585 tons;
 - (2) Enclosed shipping and receiving operations;
 - (3) Enclosed handling and mixing operations;
 - (4) Hammermill grinding operations, with a maximum capacity of twenty-eight (28) tons per hour of feed, using one (1) baghouse for control, and exhausting to stack S-2;
 - (5) Two (2) pelletizing/pellet cooling operations, each with a maximum capacity of ten (10) tons per hour, using two (2) cyclones for control, and exhausting to stacks S-3 and S-4; and
 - (6) Totally enclosed product bagging and loadout operations.

- (b) One (1) natural gas-fired boiler, with No. 2 fuel oil backup, constructed in 1997, with a maximum capacity of 10.4 million British thermal units per hour, and exhausting to stack S-1.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new units and pollution control equipment receiving new source review approval at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM₁₀, 10 tons per year SO₂, NO_x, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:

- (a) One (1) No. 2 fuel oil storage tank with a maximum capacity of 2,000 gallons;
- (b) One (1) molasses storage tank with a maximum storage capacity of 50 tons; and
- (c) One (1) animal fat storage tank with a maximum capacity of 50 tons.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) AA to 177-5092-00067, issued March 11, 1997; and
- (b) CP177-5092-00067, issued May 29, 1996.

All conditions from previous approvals were incorporated into this FESOP except the following:

Condition Not Included: Conditions 5 and 6 of CP177-5092-00067, issued May 29, 1996. These conditions state limits pursuant to 326 IAC 6-3-2 (Process Operations)

Reason Not Included: These conditions were not included because this source is not subject to the requirements of 326 IAC 6-3-2. Since this source, which has the potential to emit greater than one hundred (100) tons per year of particulate matter, is located in Wayne County, which is listed in 326 IAC 6-1-7, but does not have any specific limits pursuant to 326 IAC 6-1-14, it is subject to 326 IAC 6-1-2. The determination made in the TSD of CP177-5092-00067 that states that since the source is not located in Wayne Township, it is not subject to 326 IAC 6-1-2 is incorrect. The limitations pursuant to 326 IAC 6-1-2 are placed in the this permit in place of the limits pursuant to 326 IAC 6-3-2.

Condition Not Included: Condition 4 of CP177-5092-00067, issued May 29, 1996. Condition 4 states that pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the emissions from the boiler shall be limited to 0.5 pounds per million British thermal unit heat input.

Reason Not Included: This limit has not been included in this permit because this limit was for the 16.8 MMBtu/hr boiler. The 16.8 MMBtu/hr boiler was replaced by the 10.4 MMBtu/hr boiler in the

administrative amendment to CP177-5092-00067. Additionally, the source is not subject to the requirements of 326 IAC 6-2-4 because it is subject to the requirements of 326 IAC 6-1-2.

Condition Not Included: Condition 9 and 10 of CP177-5092-00067, issued May 29, 1996. Condition 9 states that pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), the emissions from the boiler shall be limited to 0.5 pounds per million British thermal unit heat input. Condition 10 states that the Permittee is subject to the requirements of 326 IAC 7-2-1.

Reason Not Included: These limits have not been included in this permit because these limits were applicable to the 16.8 MMBtu/hr boiler. The 16.8 MMBtu/hr boiler was replaced by the 10.4 MMBtu/hr boiler in the administrative amendment to CP177-5092-00067. The boiler currently at the source does not have the potential to emit greater than twenty-five (25) tons per year of sulfur dioxide. Therefore the boiler is not subject to the requirements of 326 IAC 7-1.1-2 or 326 IAC 7-2-1.

Air Pollution Control Justification as an Integral Part of the Process

As determined during the preparation of CP177-5092-00067, issued May 29, 1996, the baghouses and cyclones are not considered integral to the process. The company indicated in the application that the baghouse and cyclones were integral to the process because the baghouse and cyclones recycle material back through the process. After further investigation, it was determined that baghouse and cyclones only return less than 1% of the material throughput back to the process. Additionally, the process can operate without the baghouse and cyclones. For this reason, IDEM, OAQ has determined that the baghouse and cyclones will not be considered as an integral part of the animal feed processing operation. Therefore, the permitting level will be determined using the potential to emit before the baghouse and cyclone.

Enforcement Issue

- (a) IDEM is aware that the source did not submit an application for a Title V permit or FESOP within twelve (12) months of becoming subject to the Part 70 Permit Program as required by 326 IAC 2-7-4 (Permit Application). The source received a construction permit to build the operation on May 29, 1996. The source was required to apply for a Title V or FESOP within twelve (12) months of beginning operation. An operating permit application was not received until April 25, 2002. Additionally the source was sent a letter dated March 13, 2002 stating that the source's current permit had expired and the source had not yet submitted a renewal application.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on April 25, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (page 1 through 5).

Potential To Emit for the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	936.26
PM-10	902.49
SO ₂	23.10
VOC	0.3
CO	3.8
NO _x	6.51

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Benzene	9.566x10 ⁻⁵
Dichlorobenzene	5.466x10 ⁻⁵
Formaldehyde	3.416x10 ⁻³
Hexane	8.199x10 ⁻²
Toluene	1.549x10 ⁻⁴
Lead	4.3278x10 ⁻⁴
Cadmium	1.8711x10 ⁻⁴
Chromium	2.0077x10 ⁻⁴
Manganese	2.9031x10 ⁻⁴
Nickel	2.3266x10 ⁻⁴
Arsenic	1.82x10 ⁻⁴
Beryllium	1.37x10 ⁻⁴
Mercury	1.37x10 ⁻⁴
Selenium	6.83x10 ⁻⁴
TOTAL	0.09

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards

that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Process/ Emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Receiving*	Less than 49.0 (326 IAC 2-2)	Less than 16.0 (326 IAC 2-8)	-	-	-	-	-
Shipping*		Less than 16.0 (326 IAC 2-8)	-	-	-	-	-
Handling (including mixing)*		Less than 38.0 (326 IAC 2-8)	-	-	-	-	-
Grinding/ Hammermilling*	Less than 111.1 (326 IAC 2-2)	Less than 9.0 (326 IAC 2-8)	-	-	-	-	-
Pellet Cooling Operations*	Less than 88.7 (326 IAC 2-2)	Less than 19.0 (326 IAC 2-8)	-	-	-	-	-
Boiler	0.65	0.65	23.10	0.3	3.8	6.51	Neg
Total PTE After Issuance	Less than 250	Less than 100	23.10	0.3	3.8	6.51	Neg

*These operations are also subject to the requirements of 326 IAC 6-1-2 (Nonattainment Areas) which limit emissions of particulate matter to less than 0.03 gr/dscf.

Neg = Negligible

County Attainment Status

The source is located in Wayne County.

Pollutant	Status
PM-10	Attainment
SO ₂	Maintenance Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Wayne County has been designated as attainment or unclassifiable for ozone.
- (b) Wayne County has been classified as attainment or unclassifiable for PM₁₀, SO₂, NO₂, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) The boiler is subject to the requirements of 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because it has a capacity greater than ten (10) million British thermal units per hour and it was constructed after June 9, 1989, the applicability date of the rule. Pursuant to this rule, the boiler shall not emit greater than 0.5 pounds of sulfur dioxide per million British thermal units of heat input, or as an alternative, shall not combust fuel oil that contains greater than 0.5 weight percent sulfur.
- (b) The animal feed processing operation is not subject to the requirements of 40 CFR 60, Subpart DD (Standards of Performance for Grain Elevators) because pursuant to 40 CFR 60.301(c), this rule is not applicable to animal food manufacturers.
- (c) The insignificant storage tanks are not subject to the requirements of 40 CFR Part 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) even though they were constructed after the applicability date of this rule because they do not have a capacity greater than forty (40) cubic meters.
- (d) This source is not subject to the requirements of 40 CFR 63 (National Emission Standards for Hazardous Air Pollutants (NESHAPs)).

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to CP177-5092-00067, issued May 29, 1996, the Permittee shall be subject to the following emission limitations:

Operation	PM Emission Limit (lb/hr)	PM Emission Limit (ton/yr)
Receiving/Shipping/Handling	11.2	49.0
Grinding/Hammermilling	25.4	111.1
Pellet Cooling Operations	20.3	88.7

These limits are structured such that, when including emissions from the boiler, the source total PM emissions remain below two hundred fifty (250) tons per year. This renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

The source will be in compliance with this limit by operating the handling operations (including mixing) inside the building under negative pressure and by operating the baghouse and cyclones at all times that the grinding/hammermilling and pellet cooling processes are in operation.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This source is not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) because the animal feed processing operation was constructed in 1996, which is before the applicability date of July 27, 1997.

326 IAC 2-6 (Emission Reporting)

This source is located in Wayne County and the potential to emit of PM10 is limited to less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (FESOP)

The source shall be subject to the following emission limitations:

Operation	PM10 Emission Limit (lb/hr)	PM10 Emission Limit (ton/yr)
Receiving	3.65	16.0
Shipping	3.65	16.0
Handling	8.68	38.0
Grinding/Hammermilling	2.05	9.0
Pellet Cooling Operations	4.34	19.0

These limits are structured such that when including emissions from the boiler, the total source PM10 emissions remain less than one hundred (100) tons per year. This renders the requirements of 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 not applicable.

The source will be in compliance with this limit by operating the handling operations (including mixing) inside the building under negative pressure and by operating the baghouse and cyclones at all times that the grinding/hammermilling and pellet cooling processes are in operation.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Animal Feed Processing Operation

326 IAC 6-1-2 (Nonattainment Area Limitations)

This source is subject to the requirements of 326 IAC 6-1-2 (Nonattainment Area Limitations) because this source is located in Wayne County, has the potential to emit greater than one hundred (100) tons per year of PM, and is not specifically regulated in 326 IAC 6-1-14 (Wayne County). Pursuant to this rule, emissions of particulate matter (PM) shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

This source is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because this source is subject to the requirements of 326 IAC 6-1-2 (Nonattainment Area Limitations).

State Rule Applicability - Boiler

326 IAC 6-1-2 (Nonattainment Area Limitations)

This source is subject to the requirements of 326 IAC 6-1-2 (Nonattainment Area Limitations) because this source is located in Wayne County, has the potential to emit greater than one hundred (100) tons per year of PM, and is not specifically regulated in 326 IAC 6-1-14 (Wayne County). Pursuant to this rule, emissions of particulate matter (PM) from the boiler shall not exceed 0.6 pounds per million British thermal unit heat input.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

This source is not subject to the requirements of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because it is subject to the requirements of 326 IAC 6-1-2 (Nonattainment Area Limitations).

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

The boiler is not subject to the requirements of 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations) because, at maximum capacity, it does not have the potential to emit greater than twenty-five (25) tons per year of sulfur dioxide.

State Rule Applicability - Insignificant No. 2 Fuel Oil Storage Tank

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The insignificant fuel oil storage tank is not subject to the provisions of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) even though it was constructed after January 1, 1980 because it does not have a capacity greater than 39,000 gallons.

Testing Requirements

No testing is required for this source because the source will be in compliance with the PSD minor and FESOP limitations by operating the receiving, shipping, and handling operations inside the building under negative pressure and by operating the baghouse and cyclones at all times that the grinding/hammermilling and pellet cooling processes are in operation. Parameter monitoring and inspections for the baghouses and cyclones will ensure that they operate properly. There is no evidence that the source is not in compliance with the applicable limits. Testing would not provide any additional information to aid in compliance determination.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous

compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

1. The animal feed processing operation has applicable compliance monitoring conditions as specified below:
 - (a) Once per shift visible emissions notations of S-2, S-3, and S-4 exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (b) The Permittee shall record the total static pressure drop across the baghouse controlling the grinding/hammermilling operation, at least once per shift when the grinding/hammermilling operation is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 to 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (c) An inspection shall be performed each calendar quarter of all bags and cyclones controlling the grinding/hammermilling process when venting to the atmosphere. All defective bags and cyclones shall be replaced.
 - (d) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation,

Implementation, Records, and Reports, shall be considered a violation of this permit.

- (e) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (f) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the baghouse and cyclones for the grinding/hammermilling and pellet cooling operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), 326 IAC 2-8 (FESOP), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21.

- 2. The boiler has applicable compliance monitoring conditions as specified below:

- (a) Once per shift visible emissions notations of S-1 exhaust shall be performed during normal daylight operations when combusting No. 2 fuel oil and exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Conclusion

The operation of this animal feed processing operation shall be subject to the conditions of the attached proposed FESOP No.: F177-15941-00067.

Appendix A: Emission Calculations
Company Name: ADM Alliance Nutrition, Inc.
Address City IN Zip: 4359 State Road 1 North, Hagerstown, IN 47346
Permit Number: 177-15941-00067
Plant ID: 177-00067
Reviewer: ERG/KC
Date: 5/31/02

Operation	Throughput (ton/hr)	PM Emission Factor (lb/ton) ^a	PM10 Emission Factor (lb/ton) ^a	Uncontrolled PM Emissions (ton/yr)	Uncontrolled PM10 Emissions (ton/yr)	Control	Control Efficiency	Controlled PM Emissions (ton/yr)	
Receiving	30	0.017	0.0025	2.23	0.33	Total enclosure (inside a building)	0%	2.23	0.33
Shipping	30	0.0033	0.0008	0.43	0.11	Total enclosure (inside a building)	0%	0.43	0.11
Handling (includes mixing)	30	5.5	5.5	722.70	722.70	Total enclosure (inside a building) under negative pressure ^b	95%	36.14	36.14
Grinding Hammermilling	28	0.012	0.012	147.17	147.17	Baghouse	99%	1.47	1.47
Pellet Cooling Operations	20	0.36	0.18	63.07	31.54	Cyclone	50%	31.54	15.77
Total				935.61	901.84			71.81	53.81

^a Receiving and shipping emission factors are from AP-42 Table 9.9.1-2

Handling emission factor is from FIREv6-23

Grinding emission factor is from AP-42 Table 9.9.1-2 and is controlled. Uncontrolled emissions were calculated using the baghouse control efficiency.

Pellet cooler emission factor is from AP-42 Table 9.9.1-2 and is controlled. Uncontrolled emissions were calculated using the control efficiency of the cyclones.

^b These operations are totally enclosed in a building, under a slight negative pressure. There are no roof vents or side vents.

Methodology

Uncontrolled Emissions (ton/yr) = Throughput (ton/hr) * Emission Factor (lb/ton) * 8760 (hr/yr) / 2000 (lb/ton)

Controlled Emissions (ton/yr) = Uncontrolled Emissions (ton/yr) * (1-Control Efficiency)

Uncontrolled Emission Factor (lb/ton) = Controlled Emission Factor (lb/ton) / (1-Control Efficiency)

Appendix A: Emissions Calculations

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Natural Gas Combustion Only**MM BTU/HR <100****Small Industrial Boiler****Company Name: ADM Alliance Nutrition, Inc.****Address City IN Zip: 4359 State Road 1 North, Hagerstown, IN 47346****Permit Number: 177-15941-00067****Plant ID: 177-00067****Reviewer: ERG/KC****Date: 5/31/02***10.4 MMBtu/hr boiler with the capacity to fire both natural gas and fuel oil*

Heat Input Capacity

Potential Throughput

MMBtu/hr

MMCF/yr

10.4

91.1

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.3	0.3	0.0	4.6	0.3	3.8

****Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32****Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions
Company Name: ADM Alliance Nutrition, Inc.
Address City IN Zip: 4359 State Road 1 North, Hagerstown, IN 47346
Permit Number: 177-15941-00067
Plant ID: 177-00067
Reviewer: ERG/KC
Date: 5/31/02

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HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.566E-05	5.466E-05	3.416E-03	8.199E-02	1.549E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.278E-05	5.011E-05	6.377E-05	1.731E-05	9.566E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

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Company Name: ADM Alliance Nutrition, Inc.
Address City IN Zip: 4359 State Road 1 North, Hagerstown, IN 47346
Permit Number: 177-15941-00067
Plant ID: 177-00067
Reviewer: ERG/KC
Date: 5/31/02

10.4 MMBtu/hr boiler with the capacity to fire both natural gas and fuel oil

Heat Input Capacity	Potential Throughput	S = Weight % Sulfur
MMBtu/hr	kgals/year	0.5
10.4	650.7429	

		Pollutant			
Emission Factor in lb/kgal	PM* 2	SO2 71 (142.0S)	NOx 20	VOC 0.34	CO 5
Potential Emission in tons/yr	0.65	23.10	6.51	0.11	1.63

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
Company Name: ADM Alliance Nutrition, Inc.
Address City IN Zip: 4359 State Road 1 North, Hagerstown, IN 47346
Permit Number: 177-15941-00067
Plant ID: 177-00067
Reviewer: ERG/KC
Date: 5/31/02

HAPs - Metals

Emission Factor in lb/mmBtu	Arsenic 4.00E-06	Beryllium 3.00E-06	Cadmium 3.00E-06	Chromium 3.00E-06	Lead 9.00E-06
Potential Emission in tons/yr	1.82E-04	1.37E-04	1.37E-04	1.37E-04	4.10E-04

HAPs - Metals (continued)

Emission Factor in lb/mmBtu	Mercury 3.00E-06	Manganese 6.00E-06	Nickel 3.00E-06	Selenium 1.50E-05
Potential Emission in tons/yr	1.37E-04	2.73E-04	1.37E-04	6.83E-04

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton